

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

UNITED STATES OF AMERICA,	)	CASE NO. 1:24 CV 0804
	)	
Plaintiff,	)	MAGISTRATE JUDGE
	)	JONATHAN D. GREENBERG
v.	)	
	)	
\$43,343.00 IN U.S. CURRENCY,	)	
	)	STIPULATED SETTLEMENT
	)	AGREEMENT AND DECREE OF
Defendant.	)	<u>FORFEITURE</u>

1. This is an action for civil forfeiture pursuant to 21 U.S.C. § 881(a)(6) against \$43,343.00 U.S. Currency seized on November 28, 2023, (“the Defendant property”).

2. The United States and Claimant Raymond Gordon, (hereinafter, “the parties”), having come to an agreement in this case with respect to the Defendant property, stipulate and agree, as follows:

A. The United States had probable cause to institute this forfeiture action.

B. The United States served notice of this forfeiture action on Raymond Gordon and all other potential claimants.

C. Raymond Gordon filed a claim to the Defendant property in the above-captioned case.

D. As part of this agreement, Raymond Gordon hereby withdraws his claim, and agrees to the forfeiture to the United States of \$39,009.00 of the \$43,343.00 in U.S. Currency seized.

E. In consideration for Raymond Gordon withdrawing his claim as stated above in paragraph D, the United States hereby dismisses and agrees to the return of the remaining \$4,334.00 of the \$43,343.00 in U.S. Currency seized to Raymond Gordon through his attorney, Brian D. Joslyn.

F. Once the Stipulated Settlement Agreement and Decree of Forfeiture is approved by this Court, the Defendant property, in the amount outlined above, shall be returned to Raymond Gordon, through his counsel, Brian D. Joslyn.

G. Raymond Gordon hereby agrees not to commence any action or make any claim, nor to permit the filing of any action or the making of any claim on his behalf, against any of the law enforcement authorities involved in the prosecution of the forfeiture of the Defendant property against the United States, or any of its departments, agencies, agents, and employees, or against any local law enforcement department, or any of its agents and officers, arising out of the forfeiture proceedings against the Defendant property. Further, Raymond Gordon waives any claim(s) he may have, including claims for attorney fees and claimed violations of constitutional rights, arising out of the prosecution of forfeiture proceedings against the Defendant property.

H. All costs and attorney's fees shall be paid by the respective parties.

THEREFORE, it is hereby ORDERED, ADJUDGED, AND DECREED:

1. \$39,009.00 of the \$43,343.00 in U.S. Currency is hereby finally forfeited to the United States in accordance with 21 U.S.C. § 881, and no right, title, or interest shall exist in Raymond Gordon, or any other person and the United States shall assume possession and take control of the forfeited currency and shall dispose of it in accordance with law.
2. The remaining \$4,334.00 of the \$43,343.00 in U.S. Currency is hereby dismissed and shall be returned as agreed to above.

REBECCA C. LUTZKO  
United States Attorney

Date: 7-15-24

1-1-25

Henry F. DeBaggis (OH: 0007561)  
Assistant U.S. Attorney  
Counsel for United States of America

Date: 7-12-24

[Signature]  
Raymond Gordon

Date: 7/12/24

[Signature]  
Brian D. Joslyn (OH: 0087356)  
Counsel for Claimant Raymond Gordon

IT IS SO ORDERED this \_\_\_\_\_ day of \_\_\_\_\_, 2024.



JONATHAN D. GREENBERG  
U.S. DISTRICT MAGISTRATE JUDGE